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December 11, 2023

Via ECF

Hon. Ramon E. Reyes, JR.
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Bergman v. McNally, Case No. 1:23-cv-07112-RER-CLP

Dear Judge Reyes:

Our firm represents Defendant Keith McNally in the above-referenced case. I write jointly with Plaintiff's counsel to request that: (a) the Court refer this case to the District's mediation program, and (b) that discovery be stayed in this case pending completion of mediation.

Counsel for both parties recently conferred pursuant to Rule 26(f) and agreed that it was in both parties' interest to mediate this case before any further proceedings. This is a defamation case with alleged diversity jurisdiction. The parties prefer to select a neutral from the District's roster of mediators, but if the Court sees fit, we are also open to a settlement conference before a Magistrate Judge.

Thank you for your consideration of this matter.

Respectfully submitted,


John J. Thompson

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